

Exhibit C

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK**

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In re	:	Chapter 11
	:	
DOWLING COLLEGE,	:	
f/d/b/a DOWLING INSTITUTE,	:	Case No. 16-75545 (REG)
f/d/b/a DOWLING COLLEGE ALUMNI	:	
ASSOCIATION,	:	
f/d/b/a CECOM,	:	
a/k/a DOWLING COLLEGE, INC.,	:	
	:	
Debtor.	:	
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DECLARATION OF TAMY GAROFANO

I, Tamy Garofano, hereby make the following declaration:

1. I am employed by the United States Department of Education ("Education") as a Program Specialist in the Policy Liaison and Implementation Team in the office of Federal Student Aid, Washington, D.C. I have been employed by Education since October 21, 2013.

2. As a Program Specialist at Federal Student Aid, I am the subject matter expert for the Federal Perkins Loan Program. As a Program Specialist, I work closely with the Campus-Based Operations Team to ensure that all operational activities are performed in accordance Title IV-E of the Higher Education Act, 20 U.S.C. § 1087aa-1087hh (the "HEA") and the regulations promulgated thereunder set forth at 34 CFR, Part 673 and Part 674. I work closely with post secondary institutions to ensure that both the law and regulations governing the Federal Perkins Loan Program are clearly understood and implemented on campus. I work closely with the Federal Perkins Loan servicer as well as other third-party servicers, including institutions that service their own Federal Perkins Loan portfolio.

3. Due to my extensive experience with the Perkins Loan Program, I am familiar with the costs of servicing of Perkins loan portfolios and the types and amounts of fees that such servicing can entail.

4. The Portfolio, as reported on Dowling College's Fiscal Operations Report and Application to Participate (FISAP), filed on September 28, 2015, consists of 860 borrowers. It has 283 borrowers not yet in repayment, 123 borrowers who are in repayment and current on their payments, and 454 borrowers in varying stages of default

5. There are various types and levels of servicing fees that institutions incur when servicing Federal Perkins loan portfolios. These fees depend on several factors, which include, but are not limited to, the size of the institution's portfolio, the amount of loans that are in default, as well as the number of borrowers and loans that are being serviced. A servicer will evaluate an institution's portfolio and may recommend additional fee-based add-on servicers based on the specific institution's needs. These fees are usually charged on a monthly basis or on a fee-for-service basis based on the activity per student per month. Each servicer's fees are based on these factors as well as industry standards.

6. The average cost of servicing a Perkins loan portfolio comprised of 800 to 900 borrowers ranges from \$25,000 to \$40,000. This is in addition to potential one-time charges of implementation fees or conversion fees that range from \$1 to \$20,000 per portfolio.

7. In most cases, the servicers charge additional fees for additional aspects of servicing, such as credit reporting, reporting to the National Student Loan Database System, financial literacy and/or entrance and exit counseling. These fees could range from \$1.00 to \$2 per month for each loan serviced or flat rates of \$1,000 or more per month per service.

8. Servicers could charge additional fees for loans that are delinquent or in varying stages of default or for any other services required by the institution.

9. Nationwide, only four servicers perform Perkins loan portfolio servicing.

10. Section 468(4) of the HEA, 20 U.S.C. §1087hh(4) authorizes Education to expend appropriated funds on Perkins loan servicing. Section 467(b) of the HEA, 20 U.S.C. §1087gg(b) authorizes Education to expend funds on collecting Perkins loans assigned to Education by educational institutions.

11. Education has extensive knowledge of the Perkins loans' unique attributes, as well as significant experience and expertise in servicing Perkins loan portfolios. Education has been servicing Perkins loan portfolios for over 50 years and is currently servicing hundreds of Perkins loan portfolios assigned to Education by various educational institutions with the help of Federal Perkins loan servicer.

12. Federal Perkins loan servicer is a company that collects payments, responds to customer service inquiries, and performs other administrative tasks associated with maintaining a Perkins student loan on behalf of Education. Federal Perkins loan servicer handles the billing and other services on Perkins loans held by Education. Federal Perkins loan servicer works with borrowers on repayment plans, loan consolidation, and assists borrowers with other tasks related to Perkins student loans held by Education. Prior to November 1, 2013, the Federal Perkins loan servicer was ACS (Xerox). Beginning on October 1, 2013, Education retained ECSI as its Federal Perkins loan servicer.

13. All assignments of Perkins loan portfolios by educational institutions to Education to date have been performed without compensation.

I declare the foregoing is true and correct to the best of my knowledge and belief, and given under penalty of perjury pursuant to 28 U.S.C. § 1746.

Executed on this 16 day of August, 2017.



Tamy Garofano
Program Specialist, Policy Liaison and
Implementation, Federal Student Aid
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